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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
MARIO GONZALEZ,  
  
Defendant.

CASE NO. 2:20-CR-00013 WBS

STIPULATION AND ORDER TO CONTINUE  
JUDGMENT AND SENTENCING HEARING AND  
MODIFY PRESENTENCE SCHEDULE

DATE: November 13, 2023  
TIME: 9:00 a.m.  
COURT: Hon. William B. Shubb

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for judgment and sentencing on November 13, 2023.
2. By this stipulation, the parties now move to continue the judgment and sentencing hearing until February 26, 2024. The parties understand that this date is available to the Court for a continued judgment and sentencing hearing.
3. The assigned probation officer is working to complete the presentence investigation process, and an extended timeline for the presentence report is necessary. Moreover, the parties desire additional time to conduct investigation of matters that may be relevant to sentencing.
4. It is therefore requested that the PSR and judgment and sentencing schedule be modified

as follows:

- a) Proposed Presentence Report Due: January 15, 2024
- b) Written Objections to Presentence Report Due: January 29, 2024
- c) Presentence Report Due: February 5, 2024
- d) Motion for Correction of Presentence Report Due: February 12, 2024
- e) Reply or Statement Due: February 20, 2024
- f) Judgment and Sentencing: **February 26, 2024, 9:00 a.m.**

IT IS SO STIPULATED.

Dated: November 7, 2023

PHILLIP A. TALBERT  
United States Attorney

/s/ AARON D. PENNEKAMP

AARON D. PENNEKAMP  
EMILY G. SAUVAGEAU  
Assistant United States Attorneys

Dated: November 7, 2023

/s/ TAMARA SOLOMAN

TAMARA SOLOMAN  
TASHA CHALFANT  
Counsel for Defendant  
MARIO GONZALEZ

### FINDINGS AND ORDER

IT IS SO ORDERED.

Dated: November 8, 2023



**WILLIAM B. SHUBB**  
**UNITED STATES DISTRICT JUDGE**